Entergy

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BVY 02-87

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: **Vermont Yankee Nuclear Power Station**
License No. DPR-28 (Docket No. 50-271)
Response to Questions From Resident Inspectors

In response to the October 22, 2002 questions received from the Resident Inspectors office related to Event Notification 39250, the attached information is provided.

Should you have any additional questions, please feel free to contact me at (802) 258-4140.

Sincerely,

Robert J. Wanczyk
Director – Nuclear Safety Assurance

Attachment

cc: USNRC Region 1 Administrator
USNRC Region 1 – Mr. A. Randolph Blough
USNRC Resident Inspector – VYNPS
USNRC Project Manager - VYNPS
Vermont Department of Public Service
Mr. Raymond Shadis - NECNP

A001

Attachment

1. **The event notification was initiated by a Shift Engineer (SE) ESS – What was the belief of the SE and Shift Manager (SM) who signed the event notification as to the existence of a high pressure suction trip? Were Engineering and Licensing involved during the initial evaluation?**

   Response:

   Interviews with the Shift Engineer (SE) and Shift Manager (SM) who signed the event notification indicate that both individuals clearly know there is no high-pressure suction trip mechanism. Miscommunication occurred that led to the development of the event report wording. The staff SE who developed the sheet simply wrote down what he heard, or thought he heard without any second checks. The SM who signed the report had just assumed the watch and incorrectly assumed that the reporting sheet was correct. This lack of questioning and the need to complete the 8-hour notification on time appear to be contributing causes and have been addressed as discussed in the response to question 3. Conservative decision-making (when in doubt make the notification) and the strong sense that a retraction could easily be made as further information became available also were factors.

   In-service testing (IST) – Engineering personnel were consulted late in the 8-hour period for input and that discussion centered on the IST test methodology and RCIC-22 leakage, and not the event notification.

   Licensing or Regulatory Compliance personnel were not contacted and were not involved.

2. **Do the UFSAR and Design Bases Document accurately depict S/D RCIC signals?**

   Response:

   The Reactor Core Isolation Cooling (RCIC) system is described in section 4.7 of the UFSAR, including the shutdown signals (reactor vessel hi-hi water level, turbine over speed, pump low suction pressure, turbine high exhaust pressure and low oil pressure).

   The RCIC design bases are documented in the RCIC Design Bases Document (DBD). Trip signal information is described in Section 2.5.

   Both documents accurately depict the RCIC system trip signals.

   The design bases documents and UFSAR were developed and/or revised in the last few years, including independent validation.

   Engineering confirmed that the USFAR and DBD accurately depict S/D RCIC signals.

3. **What corrective action was initiated to correct any misunderstanding on the part of operators to prevent recurrence?**

   Response:

   Immediate corrective actions included developing a description of the RCIC test and reporting evolutions, including lessons-learned and expectations, and communicating that information to personnel involved in the operability/reportability process. VY Event Report 2002-2595 was generated to capture this event into the corrective action process. Further corrective actions will be developed as part of that Event Report, as needed.

4. **Did the notification reflect a significant lack of knowledge of the operations staff regarding plant design? If not, why not?**

   Response:

   No, the notification did not reflect a significant lack of knowledge of plant design. Operator knowledge on plant design and operation is routinely evaluated through our Accredited Operations Training Programs. Operators are periodically trained and evaluated on relevant aspects of system design and operation and their performance in this area has been, and continues to be, satisfactory. RCIC system design and operation as well as AP-0156, "Notification of Significant Events", reporting requirements are covered in the Licensed Operator Requalification (LOR) program on a recurring basis.

   A review of training records for all operations personnel show that these topics were last covered in LOR phase 21.5, which occurred in August of 2000. All operations personnel satisfactorily completed training and evaluation on the referenced topics during that period. A review of evaluation records from the last two-year period revealed no significant knowledge deficiencies on RCIC system operation or on AP-0156 reporting requirements. Records for the individuals involved in the recent event were reviewed and their performance was satisfactory and consistent with that of the overall population of operators and Shift Engineers.

   Routine simulator training also includes normal and emergency operation of the RCIC system. Practical demonstrations and discussions of reporting requirements are also included in simulator training exercises.

   The review of overall training and evaluation performance of licensed personnel and Shift Engineers revealed that operations personnel continue to maintain a strong level of knowledge on plant system design and operation. This event, is in no way an indication of a significant lack of knowledge on the part of operations personnel.

5. **Are licensed operator training lesson plans for RCIC system clear with respect to the RCIC turbine pump unit protection features?**

   Response:

   Lesson plans for RCIC and AP-0156 reporting were reviewed for technical accuracy and overall content adequacy. Both lesson plans were determined to be adequate and

technically accurate. There was no reference to a "High Suction Pressure Turbine Trip" in the RCIC training materials.

6. **Did this incident result in part from the integration of Entergy personnel from other facilities?**

   Response:

   No. The individuals involved in the initial reporting of Event Notofocation 39250 were experienced Vermont Yankee personnel and in the same positions as they were prior to the sale and transition.

7. **Not withstanding the reference to RCIC high suction pressure pump trip feature, did the information included in the initial event notification (EN) meet VY's EN standards?**

   Response:

   No. The event description did not accurately communicate the AP-0156 requirements and amplifying information that prompted the notification. This issue was addressed in the lessons-learned communication regarding the event notification (see response to question 3).

8. **Alarm response – what did the alarm response state?**

   Response:

   The Alarm Response Sheet (ARS) identifies in-leakage through valve RCIC-22 as a potential source for the suction pressure high alarm. Shift staff reviewed the ARS and operators took appropriate actions based on the system test configuration to isolate the RCIC system and reduce the pressure.